

Children's Health Protection Advisory Committee

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June 8, 2004

Michael Leavitt

Administrator

United States Environmental Protection Agency

1200 Pennsylvania Avenue

Washington, D.C. 20460

RE: Fish Consumption Advisory

Dear Administrator Leavitt:

The Children's Health Protection Advisory Committee (CHPAC) commends the EPA and FDA for successfully developing a joint advisory on mercury contamination in fish. Consumption of fish is a primary route of exposure to methylmercury, a neurotoxin of major concern to children. We recognize the challenge of reconciling the different perspectives of the two agencies and appreciate the effort necessary to produce the useful joint advisory.

While mercury is clearly a significant children's health problem, it is not the only contaminant of concern in fish. Other toxicants, particularly organochlorine compounds such as PCBs and dioxins, are also widely found in fish and convey potentially serious risks to children with potentially lifelong effects. For example, farm raised salmon, which are low in mercury, are sometimes high in PCBs. An advisory based solely on mercury may thus inadvertently lead to increased consumption of fish that are contaminated with harmful organochlorine toxicants.

June 8, 2004
Michael Levitt, Administrator

Building on this successful collaboration, the CHPAC recommends that you contact Secretary Thompson to invite FDA, in conjunction with EPA, to undertake the following:

- 1) Based on current data, produce a joint, integrated fish consumption advisory for children and women of childbearing age that addresses multiple contaminants.
- 2) Use current science addressing multiple contaminants to develop a clear public health message addressing the risks and benefits of fish consumption.
- 3) Evaluate existing data and fill essential data gaps to identify additional major contaminants in fish.

Since fish are a common dietary source of protein and other essential nutrients, consumers need to have comprehensive information to make informed decisions. We urge you to move expeditiously on this additional work, and are confident that working together EPA and FDA can improve upon the existing fish consumption advisory.

Sincerely,



Melanie A. Marty, Ph.D., Chair
Children's Health Protection Advisory Committee

cc: Tom Gibson, Chief of Staff
Stephen Johnson, Acting Deputy Administrator
Benjamin Grumbles, Acting Assistant Administrator for Water
Lester M. Crawford, DVM, PhD, Acting Commissioner,
U.S. Food and Drug Administration
Joanne Rodman, Office of Children's Health Protection
Bill Sanders, Acting Director, Office of Children's Health Protection